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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

INDEX NEWSPAPERS LLC, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**DECLARATION OF ATHUL ACHARYA
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO FEDERAL
DEFENDANTS' MOTION TO DISMISS
AND TO STAY DISCOVERY**

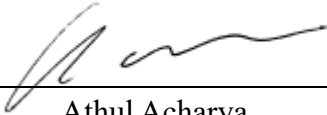
ACHARYA DECLARATION IN SUPPORT OF PLAINTIFFS' OPPOSITION TO FEDERAL
DEFENDANTS' MOTION TO DISMISS AND TO STAY DISCOVERY

I, Athul Acharya, declare:

1. I am an attorney at BraunHagey & Borden LLP and counsel of record for Plaintiffs. I base this declaration on facts within my personal knowledge and if called upon to testify, I could and would testify competently thereto.
2. The federal agents refused to assent to Plaintiffs' amending their pleading to include allegations based on the mountain of declarations Plaintiffs put into the record prior to the Court granting Plaintiffs' motion for preliminary injunction.
3. The federal agents appeared at depositions of City employees Craig Lehman, Colby Marrs, and Justin Damerville. At the deposition of Craig Lehman, counsel for the federal agents asked questions of the deponent.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: October 19, 2020



Athul Acharya